IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF OKLAHOMA

IN RE:

SCOTTIE GENE ROPER SHEILA ANN ROPER,

DEBTORS.

Case No.: BK-15-80229-

Chapter 13

OBJECTION TO CHAPTER 13 PLAN OF DEBTORS

Comes now the secured creditor, Ocwen Loan Servicing, LLC, by their attorney, Jim Timberlake, and hereby objects to the Chapter 13 Plan of Debtors. In support of this Objection, Ocwen Loan Servicing, LLC would show the Court as follows:

- 1. Ocwen Loan Servicing, LLC is the holder of a purchase money note and mortgage on the residence, ("mortgaged property") of Debtors. Said note and mortgage has an outstanding balance of \$131,925.20 plus accruing interest along with reasonable attorney fees and for all costs of the action.
- 2. The proposed Chapter 13 Plan of the Debtors reflects an arrearage amount of \$11,000.00. Ocwen Loan Servicing, LLC disputes this amount and would propose that the estimated arrearage amount is \$16,332.87.

WHEREFORE, PREMISES CONSIDERED, secured creditor, Ocwen Loan Servicing, LLC, moves the Court to reject the proposed Chapter 13 Plan of Debtors and/or to grant adequate protection or such other and further relief as may be entitled.

OCWEN LOAN SERVICING, LLC,

By: <u>s/ Jim Timberlake</u>

JIM TIMBERLAKE - #14945

MATTHEW J. HUDSPETH - #14613

Baer Timberlake, P.C.

4200 Perimeter Center, Suite 100

Oklahoma City, OK 73102 Telephone: (405) 842-7722

Fax: (918) 491-5424 Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Objection with postage thereon fully prepaid to the parties listed below on May 14, 2015.

Scottie Gene Roper Sheila Ann Roper 11813 Shady Dale Road Marietta, OK 73448

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

W. Mark Bonney 215 State St Ste 1000 PO Box 1548 Muskogee, OK 74402

Jimmy L. Veith 120 "A" Street NW P.O. Box 607 Ardmore, OK 73402

By: <u>s/ Jim Timberlake</u>

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